

Start mm/yyyy	End mm/yyyy	Plan Payment	Estimated Conduit Payment	Total Monthly Payment	Total Payment Over Plan Tier
10/2022	04/2023	\$ 785	N/A	\$ 785	\$ 5,495
05/2023	08/2027	\$ 1,270	N/A	\$ 1,270	\$ 66,040
09/2027	09/2027	\$ 1,465	N/A	\$ 1,465	\$ 1,465
				Total Payments:	\$ 73,000

2. If the plan provides for conduit mortgage payments, and the mortgagee notifies the Trustee that a different payment is due, the Trustee shall notify the Debtor and any attorney for the Debtor, in writing, to adjust the conduit payments and the plan funding. Debtor must pay all post-petition mortgage payments that come due before the initiation of conduit mortgage payments.

3. Debtor shall ensure that any wage attachments are adjusted when necessary to conform to the terms of the plan.

4. CHECK ONE: (X) Debtor is at or under median income. *If this line is checked, the rest of § 1.A.4 need not be completed or reproduced.*

B. Additional Plan Funding From Liquidation of Assets/Other

1. The Debtor estimates that the liquidation value of this estate is \$ 0. (Liquidation value is calculated as the value of all non-exempt assets after the deduction of valid liens and encumbrances and before the deduction of Trustee fees and priority claims.)

Check one of the following two lines.

X No assets will be liquidated. *If this line is checked, the rest of § 1.B need not be completed or reproduced.*

2. SECURED CLAIMS.

A. Pre-Confirmation Distributions. *Check one.*

X None. *If "None" is checked, the rest of § 2.A need not be completed or reproduced.*

B. Mortgages (Including Claims Secured by Debtor's Principal Residence) and Other Direct Payments by Debtor. *Check one.*

 None. *If "None" is checked, the rest of § 2.B need not be completed or reproduced.*

- X Payments will be made by the Debtor directly to the creditor according to the original contract terms, and without modification of those terms unless otherwise agreed to by the contracting parties. All liens survive the plan if not avoided or paid in full under the plan.

Name of Creditor	Description of Collateral	Last Four Digits of Account Number
Citimortgage/CENLAR	Debtors' Residence at 2052 Candelwood Drive, East Stroudsburg, Monroe County, PA	N/A

C. Arrears, including, but not limited to, claims secured by Debtor's principal residence.
Check one.

 None. *If "None" is checked, the rest of § 2.C need not be completed or reproduced.*

- X The Trustee shall distribute to each creditor set forth below the amount of arrearages in the allowed proof of claim. If post-petition arrears are not itemized in an allowed claim, they shall be paid in the amount stated below. Unless otherwise ordered, if relief from the automatic stay is granted as to any collateral listed in this section, all payments to the creditor as to that collateral shall cease, and the claim will no longer be provided for under § 1322(b)(5) of the Bankruptcy Code:

Name of Creditor	Description of Collateral	Estimated Pre-petition Arrears to be Cured	Estimated Post-petition Arrears to be Cured	Estimated Total to be paid in plan
Citimortgage/CENLAR	Debtors' Residence	\$ 59,834	N/A	\$ 59,834

D. Other secured claims (conduit payments, claims for which a § 506 valuation is not applicable, etc.)

X None. *If "None" is checked, the rest of § 2.D need not be completed or reproduced.*

E. Secured claims for which a § 506 valuation is applicable. *Check one.*

 None. *If "None" is checked, the rest of § 2.E need not be completed or reproduced.*

- X Claims listed in the subsection are debts secured by property not described in § 2.D of this plan. These claims will be paid in the plan according to modified terms, and liens retained until the earlier of the payment of the underlying debt determined under nonbankruptcy law or discharge under § 1328 of the Code. The excess of the creditor's claim will be treated as an unsecured claim. Any claim listed as "\$0.00" or "NO VALUE" in the "Modified Principal Balance" column below will be treated as an unsecured claim. The liens will be avoided or limited through the plan or Debtor will file an adversary action (select method in last column). To the extent not already determined, the amount, extent or validity of the allowed secured claim for each claim listed below will be determined by the court at the confirmation hearing. Unless otherwise ordered, if the claimant notifies the Trustee that the claim was paid, payments on the claim shall cease.

Name of Creditor	Description of Collateral	Value of Collateral (Modified Principal)	Interest Rate	Total Payment	Plan, Adversary or Other Action
Penn Estates POA	Debtors' Residence	\$ 1,597	15%	\$ 2,279.40	Plan

F. Surrender of Collateral. Check one.

- X None. If "None" is checked, the rest of § 2.F need not be completed or reproduced.

G. Lien Avoidance. Do not use for mortgages or for statutory liens, such as tax liens. Check one.

___ None. If "None" is checked, the rest of § 2.G need not be completed or reproduced.

- X The Debtor moves to avoid the following judicial and/or nonpossessory, non-purchase money liens of the following creditors pursuant to § 522(f) (this § should not be used for statutory or consensual liens such as mortgages).

Name of Lien Holder.	Penn Estates Property Owners Assn.	Penn Estates Property Owners Assn.	Penn Estates Property Owners Assn.
Lien Description. (For a judicial lien, include court and docket number.)	Monroe County 7779-CV-2015	Monroe County 00375-CV-2016	Monroe County 1805-CV-2018
Description of the lien property.	Debtors' Residence	Debtors' Residence	Debtors' Residence
Liened Asset Value	\$ 193,000	\$ 193,000	\$ 193,000
Sum of Senior Liens	\$ 277,292.27	\$ 277,292.27	\$ 277,292.27
Exemption Claimed	N/A	N/A	N/A
Amount of Lien	\$ 5,176.60	\$ 4,884.22	\$ 7,216.33
Amount Avoided	\$ 5,176.60	\$ 4,884.22	\$ 7,216.33

Name of Lien Holder.	North Star Capital Acquisition, LLC	Michaels, Louis & Associates, Inc.	KMB Plumbing & Electrical
Lien Description. (For a judicial lien, include court and docket number.)	Monroe County 7508-CV-2011	Monroe County 6285-CV-2013	Monroe County 3279-CV-2021
Description of the lien property.	Debtors' Residence	Debtors' Residence	Debtors' Residence
Liened Asset Value	\$ 193,000	\$ 193,000	\$ 193,000
Sum of Senior Liens	\$ 277,292.27	\$ 277,292.27	\$ 277,292.27
Exemption Claimed	N/A	N/A	N/A
Amount of Lien	\$ 1,207.59	\$ 1,299.22	\$ 4,211.80
Amount Avoided	\$ 1,207.59	\$ 1,299.22	\$ 4,211.80

3. PRIORITY CLAIMS.

A. Administrative Claims

1. Trustee's Fees. Percentage fees payable to the Trustee will be paid at the rate fixed by the United States Trustee.
2. Attorney's fees. Complete only one of the following options:
 - a. In addition to the retainer of \$ 0 already paid by the Debtor, the amount of \$ 4,500 in the plan. This represents the unpaid balance of the presumptively reasonable fee specified in L.B.R. 2016-2(c); or
 - b. \$_____ per hour, with the hourly rate to be adjusted in accordance with the terms of the written fee agreement between the Debtor and the attorney. Payment of such lodestar compensation shall require a separate fee application with the compensation approved by the Court pursuant to L.B.R. 2016-2(b).
3. Other. Other administrative claims not included in §§ 3.A.1 or 3.A.2 above.
Check one of the following two lines.

X None. *If "None" is checked, the rest of § 3.A.3 need not be completed or reproduced.*

B. Priority Claims (including certain Domestic Support Obligations).

Allowed unsecured claims, entitled to priority under § 1322(a) will be paid in full unless modified under § 9.

Name of Creditor	Estimated Total Payment

C. Domestic Support Obligations assigned to or owed to a governmental unit under 11 U.S.C. §507(a)(1)(B). *Check one of the following two lines.*

X None. *If "None" is checked, the rest of § 3.C need not be completed or reproduced.*

4. UNSECURED CLAIMS

A. Claims of Unsecured Nonpriority Creditors Specially Classified. *Check one of the following two lines.*

X None. *If "None" is checked, the rest of § 4.A need not be completed or reproduced.*

B. Remaining allowed unsecured claims will receive a pro-rata distribution of funds remaining after payment of other classes.

5. EXECUTORY CONTRACTS AND UNEXPIRED LEASES. *Check one of the following two lines.*

X None. *If "None" is checked, the rest of § 5 need not be completed or reproduced.*

6. VESTING OF PROPERTY OF THE ESTATE.

Property of the estate will vest in the Debtor upon

Check the applicable line:

- X plan confirmation.
 ___ entry of discharge.
 ___ closing of case:

7. DISCHARGE: (Check one)

- (X) The debtor will seek a discharge pursuant to § 1328(a).
 () The debtor is not eligible for a discharge because the debtor has previously received a discharge described in § 1328(f).

8. ORDER OF DISTRIBUTION:

If a pre-petition creditor files a secured, priority or specially classified claim after the bar date, the Trustee will treat the claim as allowed, subject to objection by the Debtor.

Payments from the plan will be made by the Trustee in the following order:

Level 1	Adequate protection payments	\$ -0-	
Level 2	Debtor's attorney's fees.	\$ 4,500	
Level 3	Domestic Support Obligations	\$ -0-	
Level 4	Priority claims, pro rata	\$ -0-	
Level 5	Secured claims, pro rata	\$ 62,113.40	
Level 6	Specially classified unsecured claims	\$ -0-	
Level 7	General unsecured claims	\$ 108.60	
Level 8	Untimely filed unsecured claims to which the debtor(s) has/have not objected.	\$ -0-	
	Subtotal		\$ 66,722
	Trustee Commission (Estimated at 8.6%)	\$ 6,278	
	Total		\$ 73,000

If the above Levels are filled in, the rest of § 8 need not be completed or reproduced.

9. NONSTANDARD PLAN PROVISIONS

Include the additional provisions below or on an attachment. Any nonstandard provision placed elsewhere in the plan is void. (NOTE: The plan and any attachment must be filed as one document, not as a plan and exhibit.)

- A. This Plan contains a chart in Section 8, above, that contains estimated distributions to each class of creditors, in addition to all other items required by the Model Plan.
- B. Confirmation of this Plan shall constitute a finding that the real property known as **2052 Candlewood Drive, East Stroudsburg, Monroe County, Pennsylvania**, hereinafter referred to as the "Property", shall a value of \$ 193,000, for all purposes.
- C. This Plan provides for the avoidance of the entirety of the judgment lien of **North Star Capital Acquisition, LLC**. See Section 2.G, above. A copy of this Plan and the Discharge Order entered in the case may be filed in the appropriate office of the Court of Common Pleas of **Monroe County** to demonstrate the judgment lien of **North Star Capital Acquisition, LLC**, was avoided.
- D. This Plan provides for the avoidance of the entirety of the judgment lien of **Michaels, Louis & Associates, Inc.**. See Section 2.G, above. A copy of this Plan and the Discharge Order entered in the case may be filed in the appropriate office of the Court of Common Pleas of **Monroe County** to demonstrate the judgment lien of **Michaels, Louis & Associates, Inc.**, was avoided.

- E.** This Plan provides for the avoidance of the entirety of the judgment lien of **KMB Plumbing & Electrical**. See Section 2.G, above. A copy of this Plan and the Discharge Order entered in the case may be filed in the appropriate office of the Court of Common Pleas of **Monroe** County to demonstrate the judgment lien of **KMB Plumbing & Electrical** was avoided
- F.** This Plan provides for the avoidance of the entirety of three judgment liens of **Penn Est. Property Owners Assoc.**. See Section 2.G, above. A copy of this Plan and the Discharge Order entered in the case may be filed in the appropriate office of the Court of Common Pleas of **Monroe** County to demonstrate the three judgment liens of **Penn Est. Property Owners Assoc.**, were avoided

Dated: September 23, 2022

/s/ J. Zac Christman
J. Zac Christman, Esquire, Attorney for Debtor

/s/ David G. Derosa
DAVID G. DEROSA, Debtor

/s/ Erin N. Derosa
ERIN N. DEROSA, Joint Debtor

By filing this document, the debtor, if not represented by an attorney, or the Attorney for Debtor also certifies that this plan contains no nonstandard provisions other than those set out in § 9.